

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et
al.*,

Debtors.¹

PROMESA
Title III
No. 17 BK 3283-LTS
(Jointly Administered)

**NOTICE OF WITHDRAWAL OF CERTAIN CLAIMS SUBJECT TO OMNIBUS
OBJECTIONS OF THE COMMONWEALTH OF PUERTO RICO, THE PUERTO RICO
PUBLIC BUILDINGS AUTHORITY, THE PUERTO RICO HIGHWAYS AND
TRANSPORTATION AUTHORITY AND THE EMPLOYEES RETIREMENT SYSTEM
OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO**

To The Honorable United States District Judge Laura Taylor Swain:

1. On August 5, 2022, the Commonwealth of Puerto Rico (the “Commonwealth”), the Puerto Rico Public Buildings Authority (“PBA”), the Puerto Rico Highways and Transportation Authority (“HTA”), and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS,” and, together with the Commonwealth, PBA, and HTA, the “Debtors”), by and through the Financial Oversight and Management Board for Puerto Rico

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

(the “Oversight Board”), as sole Title III representative of the Debtors pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),² filed various omnibus objections.

2. In light of additional information received since such filings, the Debtors respectfully withdraw, without prejudice, their respective objections to the following proofs of claim (collectively, the “Withdrawn Claims”):

- *Five Hundred First Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Unresponsive ACR Claims* [ECF No. 21758], **solely** with respect to Claim No. 132180;
- *Five Hundred Second Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Unresponsive ACR Claims* [ECF No. 21759], **solely** with respect to Claim No. 175911;
- *Five Hundred Third Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Unresponsive ACR Claims* [ECF No. 21751], **solely** with respect to Claim Nos. 72760; 170847; and 139008;
- *Five Hundred Fourth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Unresponsive ACR Claims* [ECF No. 21760], **solely** with respect to Claim Nos. 170450-1; 58604; 107954; and 28557;
- *Five Hundred Fifth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Unresponsive ACR Claims* [ECF No. 21761], **solely** with respect to Claim Nos. 48377-1 and 145262;
- *Five Hundred Sixth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Unresponsive ACR Claims* [ECF No. 21762], **solely** with respect to Claim No. 2399;
- *Five Hundred Eighth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Unresponsive ACR Claims* [ECF No. 21764], **solely** with respect to Claim Nos. 151; 140858; and 78110;
- *Five Hundred Ninth Omnibus Objection (Substantive) of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Unresponsive ACR Claims* [ECF No. 21765], **solely** with respect to Claim Nos. 71297; 148195; 147201; 53894; 99265; and 78057; and

² PROMESA is codified at 48 U.S.C. §§ 2101-2241.

- *Five Hundred Tenth Omnibus Objection (Substantive) of the Puerto Rico Highways and Transportation Authority, Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and Puerto Rico Public Buildings Authority to Unresponsive ACR Claims* [ECF No. 21766], **solely** with respect to Claim Nos. 106103; 75438; and 119134.

3. The Debtors reserve all rights with respect to the Withdrawn Claims, individually and collectively, including to object to the Withdrawn Claims on any grounds whatsoever.

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Dated: September 30, 2022
San Juan, Puerto Rico

Respectfully submitted,

/s/ Hermann D. Bauer

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